

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

INTELLECTUAL VENTURES I LLC and  
INTELLECTUAL VENTURES II LLC,

Plaintiffs,

V.

TOYOTA MOTOR CORP.; TOYOTA  
MOTOR NORTH AMERICA, INC.;  
TOYOTA MOTOR ENGINEERING  
& MANUFACTURING NORTH  
AMERICA INC.; and TOYOTA  
MOTOR SALES, U.S.A, INC.

Defendants.

Case No. 2:21-cv-389

**UNOPPOSED MOTION TO SET DEADLINE FOR DEFENDANTS TO RESPOND TO  
PLAINTIFFS' COMPLAINT AND JURY DEMAND**

COME NOW Defendants, Toyota Motor Corporation, Toyota Motor North America, Inc., Toyota Motor Engineering & Manufacturing North America, Inc., and Toyota Motor Sales U.S.A., Inc. (collectively “Toyota”) and request that the Court extend the period for the Defendants to answer or otherwise respond to Intellectual Ventures’ Complaint to on or before Sunday, January 30, 2022. Plaintiffs served Defendants Toyota Motor North America, Inc., Toyota Motor Engineering & Manufacturing North America, Inc., and Toyota Motor Sales U.S.A., Inc. on October 26, 2021. Toyota Motor Corporation has not yet been served. Local counsel for Plaintiffs has agreed to a 75-day extension of time for all Defendants to answer or otherwise plead, in exchange for Defendants’ waiver of service under the Hague Convention for Toyota Motor Corporation, a foreign entity.

Accordingly, Plaintiffs respectfully request that the Court set January 30, 2022, as the date for Toyota's responsive pleading. Plaintiffs have contacted Toyota's authorized

representative in this matter, who indicated Toyota does not oppose this motion. Plaintiffs do not make this motion for purpose of delay, but for good cause such that the Court is not burdened with a procedural dispute.

Dated: November 17, 2021

RESPECTFULLY SUBMITTED,

SCHEEF & STONE, LLP

A handwritten signature in black ink, reading "Michael Smith", written in a cursive style. The signature is positioned above a horizontal line.

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TOYOTA MOTOR NORTH AMERICA,  
INC., TOYOTA MOTOR  
ENGINEERING & MANUFACTURING  
NORTH AMERICA, INC., and  
TOYOTA MOTOR SALES U.S.A., INC.**